



United States Attorney  
Southern District of New York

86 Chambers Street  
New York, New York 10007

May 5, 2025

**BY ECF**

The Honorable Jennifer L. Rochon  
United States District Judge  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, NY 10007

*Re: The New York Times Company v. United States Department of State,  
No. 24 Civ. 8747 (JLR)*

Dear Judge Rochon:

This Office represents Defendant United States Department of State in the above-referenced case brought by Plaintiffs The New York Times Company and Amy Julia Harris, pursuant to the Freedom of Information Act (“FOIA”), 5 U.S.C. § 552. I write on behalf of all parties pursuant to the Court’s order that the parties submit joint status reports every 45 days. *See* Dkt No. 13.

On February 21, 2025, Plaintiffs, through counsel, sent Defendant a proposal to prioritize production of a narrower set of records and to defer processing of other records. Specifically, Plaintiffs have proposed that Defendant prioritize processing the records responsive to Requests 11 and 12 in the Complaint (Dkt No. 1 ¶¶ 96-106) and a portion of the records responsive to Requests 2 and 3 (*id.* ¶¶ 48-58). Defendant reports that it has located approximately 71 records responsive to Requests 11 and 12. One of the records located contains approximately 140 pages. Regarding Requests 2 and 3, Defendant has located and is processing one responsive spreadsheet that is approximately 15MB in size. Defendant estimates being able to provide the first production by the end of May or beginning of June.

The parties will submit their next status report in 45 days—by June 19, 2025.

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Respectfully submitted,

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cc: All counsel of record (via ECF)